



## MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Robert M. Summers, Ph.D.  
Deputy Secretary

April 12, 2007

Dawn Lettman, Esquire  
Assistant City Solicitor  
Baltimore City Law Department  
101 City Hall  
Baltimore, MD 21202

Mr. Christopher M. French  
Manager, Remediation & Evaluation Services  
Honeywell International, Inc.  
101 Columbia Road  
Morristown, NJ 07962-1139

Dear Ms. Lettman and Mr. French:

The Maryland Department of the Environment's (MDE) Waste Management Administration (WAS) is in receipt of an April 2, 2007, letter from Margaret Witherup Tindall, Esquire, with enclosures regarding the Swann Park site (the Park) located adjacent to the former Allied/Race Street facility in Baltimore City. The enclosed information describes sampling events conducted by Honeywell's predecessor company, Allied Chemical Corporation (Allied), in 1976, pursuant to requirements established by the "Kepone Task Force", to assess the presence of arsenic and kepone in soils in the Park. The enclosures show that significant concentrations of arsenic were identified in both surficial and deeper soils, and that remedial action was taken by Allied. Specifically, soils within 100 feet of the Allied property boundary were disked and covered with top soil.

The Waste Management Administration has reviewed its records and is unable to locate any other relevant documents on the Park indicating subsequent remedial actions or sampling occurring at the Park to substantiate the sampling events of 1976. Since the Park is used for recreational activities and the potential exists for exposure to any residual contaminants, WAS is requesting that additional screening sampling be performed to determine whether contaminants have persisted in the soils. Please submit a plan for approval prior to the sampling.

The sampling plan used in the 1976 study provides the basis for another sampling effort. WAS believes that samples should be representative of the entire site. MDE will obtain split samples from selected points during the new sampling effort. MDE shall be notified at least 24 hours prior to performance of the sampling event.



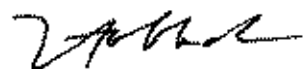
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Samples shall be analyzed by EPA approved methods for the total concentrations of, at a minimum, arsenic, kepone, copper, chromium, and lead. Appropriate QA/QC procedures must be used, and a certified laboratory shall analyze the samples. Honeywell or Baltimore City shall provide all data obtained from the samples to MDE within 24 hours of receipt.

The Waste Management Administration is directing Honeywell and Baltimore City to perform the required sampling within 5 business days of receipt of this letter. Once MDE has received and assessed the data, it will determine whether any further actions are necessary.

If you have any questions in this matter, please contact me at (410) 537-3304, or Mr. Harold L. Dye, Jr., Administrator, Hazardous Waste Program, at (410) 537-3343.

Sincerely,



Horacio Tablada, Director  
Waste Management Administration

HT/dif

cc: Mr. Ronald Nelson  
Matthew Zimmerman, Esquire  
Mr. Harold L. Dye, Jr.